

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LAWRENCE DOBROFF,

Plaintiff,

Docket No. 21-cv-01567(DRH)(ST)

-against-

HEMPSTEAD UNION FREE SCHOOL
DISTRICT, HEMPSTEAD UNION FREE
SCHOOL DISTRICT SCHOOL BOARD, RANDY
STITH, individually and in his official capacity, and
REGINA ARMSTRONG, individually and in her
official capacity,

Defendants.
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**AFFIRMATION OF AUSTIN
GRAFF IN OPPOSITION TO THE
PLAINTIFF'S MOTION TO
AMEND THE COMPLAINT**

AUSTIN GRAFF, an attorney admitted to practice law before this Court, who is not a party to this Action, affirmed to be true under penalties of perjury says:

1. I am associated with The Scher Law Firm, LLP, the attorneys for the Defendants HEMPSTEAD UNION FREE SCHOOL DISTRICT, HEMPSTEAD UNION FREE SCHOOL DISTRICT SCHOOL BOARD, RANDY STITH, individually and in his official capacity, and REGINA ARMSTRONG, individually and in her official capacity, (collective referred to as "Defendants"), in the above-entitled Action, and am familiar with the relevant facts and circumstances surrounding the allegations that comprise this litigation based upon the records maintained by my office regarding this matter. I submit this Affirmation in opposition to the Plaintiff's Motion to Amend the Complaint.

2. The Defendants rely upon the following exhibits in opposition to the Plaintiff's Motion:

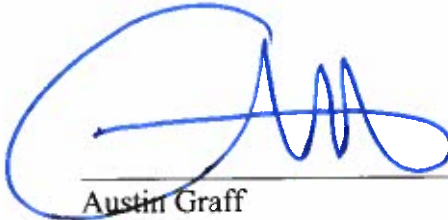
- (a) **Exhibit A** is a copy of the Plaintiff's counsel's January 18, 2021 letter;
- (b) **Exhibit B** is a copy of the Proposed Second Amended Complaint;
- (c) **Exhibit C** is a copy of the Plaintiff's N.Y. General Municipal Law § 50-h hearing transcript; and
- (d) **Exhibit D** is a copy of the District's anti-discrimination policy;

3. For the reasons argued in the accompanying Memorandum of Law, the Plaintiff's Motion should be denied.

4.

WHEREFORE, the Defendants respectfully request that the Court deny the Plaintiff's Motion and grant the Defendants' Motion to Dismiss, as well as such other and further relief as may be just and proper.

Dated: Carle Place, New York
December 10, 2021



Austin Graff